Exhibit A

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

THE STATE OF TEXAS, et al.,	§	
Plaintiffs,	§ §	C' 'I A C' N. A 20 00057 CD.
V.	§	Civil Action No. 4:20-cv-00957-SDJ
	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

STIPULATION AND PROPOSED ORDER FOR REPRODUCTION OF DISCOVERY

This stipulation and proposed order is entered into by Plaintiffs and Defendant Google LLC. It is stipulated and agreed by Plaintiffs and Google, and ordered by the Court, that:

- The materials produced by and deposition testimony of: (a) non-parties in *United States v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.) (the "EDVA Action") and in the DOJ's related pre-suit investigation of Google's display ads business, and (b) parties and non-parties in *In re: Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010 (S.D.N.Y.) (the "MDL Action") (collectively, the "Materials") are relevant and proportional to the parties' claims and defenses in this case under this District's standard. *See* Local Rule CV-26 ; *E-Contact Techs., LLC v. Apple, Inc.*, No. 1:12-CV-471-LED-KFG, 2013 WL 12143967, at *2 (E.D. Tex. Feb. 6, 2013) (citing Local Rule CV-26(d)); ECF No. 476.
- (2) Subject to and consistent with the Modified Protective Order in the EDVA Action and the Modified Confidentiality Order in the MDL Action (collectively, the "Confidentiality Orders"), Google shall reproduce in this case any Materials not previously produced to Plaintiffs in this case. To the extent any of the Materials

were designated as "Confidential" or "Highly Confidential" under either of the

Confidentiality Orders, they shall be treated as "Confidential" or "Highly

Confidential," as designated, under the confidentiality order governing this case.

See ECF No. 182.

(3) Any EDVA Non-Party, MDL Party, or MDL Non-Party that wishes to object to the

reproduction of its Materials in this case shall seek a protective order from this

Court within seven days of Google's service of this Order on it. If no such

protective order is sought or if a protective order is sought and denied, the parties

will be able to use and rely on the Materials in this case. Any reproductions of the

Materials shall be made within five business days of the above-described seven-

day period or, if applicable, within five business days of the denial of a motion for

protective order. See EDVA Modified Protective Order, Dkt. 203, ¶ 25–27; MDL

Modified Confidentiality Order, Dkt. 685, ¶¶ 25–27.

(4) All the Materials reproduced to Plaintiffs can be used by any party in this case as if

they were reproduced before the close of fact discovery in this case.

It is so stipulated, through parties' respective counsel, and Ordered by the Court on this

day of May, 2024.

Sean D. Jordan United States District Judge

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Dated: May 28, 2024

/s/ W. Mark Lanier (by permission)

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Submitted on behalf of all Plaintiff States

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on May 28, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

> /s/ R. Paul Yetter R. Paul Yetter